



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

September 30, 1997

Mr. Gene Liu
U.S. Army Corps of Engineers
215 North 17th Street
Attn: CEMRO-ED-ED
Omaha, NB 68201-4978

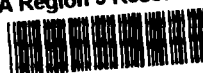
RE: Approval with Modifications of the draft Final Design
Analysis Package For Capping the Taracorp Pile; NL
Industries/Taracorp Superfund Site in Granite City, Illinois

Dear Mr. Liu:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the draft Final Design Analysis package dated May 1997 for Capping the Taracorp Pile at the NL Industries/Taracorp Superfund Site in Granite City, Illinois. U.S. EPA hereby approves the package with the enclosed modifications. These must be incorporated package and a final package must be submitted to the U.S. EPA and the Illinois Environmental Protection Agency by October 31, 1997.

The United States Army Corps of Engineers (U.S. ACE) must incorporate all comments as written, or contact me for clarification if you identify a problem with incorporating a comment verbatim.

EPA Region 5 Records Ctr.

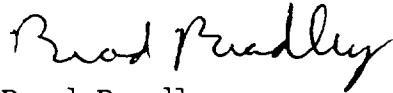


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If you have questions or need clarification, you may contact Sheri Bianchin at (312)886-4745, or me at (312) 886-4742.

Sincerely,

A handwritten signature in cursive script that reads "Brad Bradley".

Brad Bradley
Remedial Project Manager

Enclosure

cc: Bob Rogers, Illinois EPA

cc: Bob Rogers, Illinois EPA

bcc: S. Bianchin

ENCLOSURE 1

U.S. EPA-Required Modifications to the draft Final Design Analysis Package for Capping the Taracorp Pile at the NL Industries/Taracorp Superfund Site in Granite City, Illinois

The following modifications are required to be incorporated into the Final Design Analysis Package.

General Comments

1. Numerous comments from U.S. EPA's January 21, 1997, correspondence were not adequately addressed. The following U.S. EPA comments were not addressed: 2, 4, 6, 7, 13, 14, 15, 16, 17, 18, 19, 21, 22, 23, 27, 30, 32 & 33. In addition, several comments provided by the Illinois EPA (IEPA) also contained in the January 21 correspondence were not adequately addressed either. Please refer to the January 21st correspondence when revising the draft Final Design Analysis package.
2. Add the following Disclaimer to the document. If the design plan in any way conflicts with the 1990 Record of Decision (ROD) or the 1995 Decision Document/Explanation of Significant Differences (DD/ESD), the ROD and DD/ESD shall govern.
3. Provide a statement in the final design package that requires submission of an implementation schedule plan to U.S. EPA for approval.

Specific Comments:

4. **Page 1-1, Section 2, Purpose.** Add to the end of sentence as follows: . . . in accordance with the Record of Decision (ROD) and the Decision Document/ Explanation of Significant Differences (DD/ESD) for capping the Taracorp pile at the NL Industries Superfund Site in Granite City, Illinois.
5. **Page 1-2, Section 5.1.2.** Discuss further what regulatory actions are referred to here.
6. **Page 1-3, Section 5.2.2.** Taracorp was the only defendant that was named in and signed the March 1984 consent order

7. **Page 2-1, Section 1. First bullet.** Add the following to the text. Alternative B was selected since it was determined to be feasible, as protective as Alternative A, and more cost efficient than Alternative A.

FINAL DESIGN ANALYSIS

8. **Page 2-1, Section 1.1, Fourth Bullet.** Add to the sentence as follows: For aesthetics, and in accordance with public concern, . . .
9. **Page 2-1, Section 1.1, seventh bullet:** Add to the end of the first sentence as follows . . . on-site in accordance with the selected alternative.
10. **Page 2-1, Section 1.1, sixth bullet point.** The paragraph should include the following language: Determination of 1000 ppm lead, where applicable, should be done using an XRF for screening, and then followed up with lab results.
11. **Page 2-4, Section 3.2.2.1, first sentence.** Add "including native species/prairie plant " at the end of this sentence. This plan shall be developed in accordance with the document Revegetation of Superfund Sites with Native Plants: A Primer for Superfund Personnel, December 1996 (or most recent), and Beneficial Landscape Practice Guidance published in the Federal Register on August 10, 1995.
12. **Page 2-4, Section 3.2.2.1.** A separate vegetative cover implementation plan shall be required to be submitted to U.S. EPA for approval at least two months prior to completion of the cap.
13. **Page 2-4, Section 3.2.2.1.** Clarify that "V" equates to vertical and "H" equates to horizontal.
14. **Page 2-12, Section 3.6.3.** Replace the word "grass" with "vegetative".
15. **Page 2-31, Section 9.3.1.2.** Replace "2 days" with "1 day".

7. **Page 2-1, Section 1, First bullet.** Add the following to the text. Alternative B was selected since it was determined to be feasible, as protective as Alternative A, and more cost efficient than Alternative A.

FINAL DESIGN ANALYSIS

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15. **Page 2-31, Section 9.3.1.2.** Replace "2 days" with "1 day".

APPENDICES

16. **Appendix A.** Add the DD/ESD in the appendix.

DRAWINGS

17. **Alternative B: Drawing C-18, Note 2.** State "1000 ppm lead or 3 feet, whichever occurs first".

SPECIFICATIONS

18. **Page 01010-2, Section 5.3.** Combine these 15 documents into the following: Quality Assurance/Quality Control Project Plan, Site Safety and Health Plan, and Site Maintenance, Demobilization, and Project Completion Plan.
19. **Page 01450-3, Section 3.1.1.2, second line.** Insert "at least" between "collecting" and "one".
20. **Section 02935.** Revise the text to indicate that a separate vegetative cover implementation plan shall be required to be submitted to U.S. EPA for approval at least two months prior to completion of the cap. This plan shall provide for incorporating native vegetation/prairie plants.